

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CTD NETWORKS LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

No. 6:22-cv-01049-XR



**DECLARATION OF HENRY HUANG IN SUPPORT OF
MICROSOFT CORPORATION'S MOTION FOR ATTORNEYS' FEES
AND MOTION FOR SANCTIONS**

I, Henry Huang, declare the following:

1. I am an attorney with the law firm of White & Case LLP (“White & Case”). My office is located at 3000 El Camino Real, 2 Palo Alto Square, Suite 900, Palo Alto, CA 94306-2109. I represent Defendant Microsoft Corporation (“Microsoft”) and have been admitted to practice before this Court in this case filed by CTD Networks LLC (“CTD”).

2. I make this declaration in support of Microsoft’s Motion for Attorneys’ Fees and Motion for Sanctions Against Ramey LLP.

3. I am over the age of 18, and I have personal knowledge of the facts set forth herein and, if called as a witness, could and would competently testify about these matters under oath.

4. Attached as Exhibit A is a true and correct copy of CTD’s Certificate of Formation as obtained from the Secretary of State of Delaware.

5. Attached as Exhibit B is a true and correct copy of an April 25, 2023 letter from Jonathan Lamberson, counsel for Microsoft, to William P. Ramey, counsel for CTD and managing partner of the law firm of Ramey LLP.

6. Attached as Exhibit C is a true and correct copy of the transcript of the April 10, 2023 motion hearing in this case.

7. Attached as Exhibit D is a true and correct copy of the transcript of the June 29, 2023 motion hearing in this case.

8. Attached as Exhibit E is a true and correct copy of an April 9, 2023 e-mail from Kyril Talanov, counsel for CTD and counsel at the law firm of Ramey LLP, to Sylvia Fernandez, this Court’s Courtroom Deputy.

9. Attached as Exhibit F is a true and correct copy of a September 17, 2023 Docket Navigator report listing all cases filed by patentees represented by Ramey LLP with filing dates

between October 6, 2022 and August 22, 2023. Exhibit F contains six cases that were transferred to another district. Accordingly, the 228 results of the report correspond to 222 unique cases. Of the 222 unique cases listed in Exhibit F, 114 are identified as terminated.

10. Plaintiffs represented by Ramey LLP have sued Microsoft nine times in the past two years.

11. Attached as Exhibit G is an excerpt of a true and correct copy of the 2021 Report of the Economic Survey prepared by the American Intellectual Property Law Association (“AIPLA”), as obtained from AIPLA.

12. Attached as Exhibit H is a true and correct copy of the webpage at <https://www.rameyfirm.com/about/attorneys>, obtained on August 29, 2023.

13. White & Case performed legal work on behalf of Microsoft to dismiss CTD’s First Amended Complaint and to prepare the motions to seek attorneys’ fees and sanctions supported by this declaration (“Fee Motions”).

14. White & Case has arrangements with Microsoft in which some legal services are provided on a fixed-fee basis, and some are provided on a traditional hourly basis. [REDACTED]

[REDACTED] White & Case maintains records of the time spent by its billers regardless of whether the services are billed on a fixed fee or hourly basis for internal accounting purposes, among other reasons.

15. White & Case billed Microsoft a total of [REDACTED] for preparing its Second Motion to Dismiss and the instant fee and sanctions motions. White & Case maintained detailed records of the time spent by its billers on this matter, both for internal accounting purposes and for use in the event of fee requests.

16. On an hourly basis, the dollar value of the time billed to Microsoft by White & Case timekeepers whose time has been charged for work connected to the First Amended Complaint, including briefing the Second Motion to Dismiss, is \$56,692.82. This amount reflects the discounted hourly rate between White & Case and Microsoft. Entries for timekeepers who did not contribute meaningfully to the outcome of the motion were not included. Entries that included travel time were reduced to remove travel time. White & Case billing records connected to this work are summarized in the table below, and a more detailed recitation of the work White & Case performed can be found in Exhibit I, attached hereto:

Timekeeper	Position			
Henry Huang	Partner			
Jonathan Lamberson	Partner			
Shridhar Jayanthi	Associate			
Javi Vazques	Paralegal			
Total			72.4	\$ 56,692.82

17. The dollar value of the time billed to Microsoft by White & Case timekeepers whose time has been charged for work connected to the instant fee and sanctions motions is \$51,511.93. This amount reflects the discounted hourly rate agreed with Microsoft. White & Case billing records connected to this work are summarized in the table below, and a more detailed recitation of the work White & Case performed can be found in Exhibit J, attached hereto:

Timekeeper	Position	[REDACTED]	[REDACTED]	[REDACTED]
Henry Huang	Partner	[REDACTED]	[REDACTED]	[REDACTED]
Jonathan Lamberson	Partner	[REDACTED]	[REDACTED]	[REDACTED]
Shridhar Jayanthi	Associate	[REDACTED]	[REDACTED]	[REDACTED]
Total			76.8	\$ 51,511.93

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 19, 2023

Respectfully submitted,

/s/ Henry Huang

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